

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V (draft) No. V-98-043

RAYLOC - DIVISION OF GENUINE PARTS COMPANY
MORGANFIELD, KY.

June 2, 2000

STUART ECTON, CHEMICAL ENGINEER/ REVIEWER

Plant I.D. # 077-3900-0018

Application Log # F481

SOURCE DESCRIPTION:

This source re-manufactures used automobile parts such as starters, master cylinders, alternators, brake shoes, brake calipers, power steering pumps, rack and pinion parts, wiper motors, etc. The reconditioning process includes spray and dip painting, grinding, parts cleaning (burn-off ovens and degreasing) shot blasting and riveting.

COMMENTS:

Types of control:

- ➡ Paper filters are used to control paint overspray but are not required to meet any standard
- ➡ Small Afterburners are used to control VOC emissions and odors from the burn off ovens but are likewise not required by any regulation.
- ➡ Baghouses are utilized to control PM emissions from the shot blasting, grinding and riveting operations. These units *are* required to meet the standards in 59:010 and 61:020.
- ➡ Low VOC paints and coatings are used and can be considered a method of controlling VOC emissions.
- ➡ Various work practice and equipment standards for the degreaser under regulations 401 KAR 61:095 and 63:460 (40 CFR 63 Subpart T).

Emission factors:

AP-42 Section 1.4 (Natural Gas Combustion), material balance for VOC from painting and trichloroethylene losses from the degreaser.

Applicable regulations:

- 401 KAR 58:025, Asbestos standards.
 - 401 KAR 59:010, New process operations.
 - 401 KAR 59:225, New miscellaneous metal parts and products surface coating operations.
 - 401 KAR 61:132, Existing miscellaneous metal parts and products surface coating operations.
 - 401 KAR 61:020, Existing process operations.
 - 401 KAR 61:095, Existing solvent metal cleaning equipment.
 - 401 KAR 63:460, National emission standards for halogenated solvent cleaning.
- (40 CFR 63 Subpart T) **MACT**

EMISSION AND OPERATING CAPS DESCRIPTION:

An average VOC content limit of 3.5 lbs/gallon has been included in the permit pursuant to Regulation 401 KAR 59:225. A recordkeeping requirement has also been included and is sufficient to ensure compliance since all paint manufacturers list VOC content on the respective MSDS. An MSDS can quickly be matched to a specific coating upon request of our inspector. The degreaser is subject to two regulations (61:095 and 63:460) which require various work practice and equipment standards that indirectly provide emission limits. PM and opacity limits are also included pursuant to the applicable regulations: 401 KAR 59:010 and 58:025.

PERIODIC MONITORING:

Since emissions can be easily and accurately estimated using well established emission factors, a semi-annual method 9 reading is deemed sufficient periodic monitoring to ensure compliance for those affected facilities subject to 59:010 only. For those points subject to 58:025 it has been proposed that a weekly check on visible emissions be performed and recorded. A method 9 is to be performed if visible emissions are detected. These method 9 readings will be in addition to and not in lieu of the semi-annual readings.

As an aside, the affected facilities are not realistically capable of being operated in a manner which would cause the exceedance of the PM or the opacity standard. In fact, the current inspector has stated that an opacity problem has never been observed at this facility.

OPERATIONAL FLEXIBILITY:

NA

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.